WA 2917 3a

10/22/1990

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

October 22, 1990

Catherine Buller
Chemical Processors Inc.
2203 Airport Way South
Suite 400
Seattle, WA 98134

Re: Request for Pier 91 NOD response submittal date extension, and closure cost estimates

Dear Ms. Buller,

This letter is to notify you that Ecology will allow Chempro until December 27, 1990 to submit a response to the Pier 91 NOD of October 4, 1990. Ecology will expect along with this NOD response, application revisions pertaining to the facility design changes outlined in your letter of 10/18. You should be aware that if these changes entail a "significant expansion" in capacity, the facility will be subject to the application of the new siting criteria. Also, as you should know, revisions may likely elicit new issues which will result in a NOD. This NOD will count towards the limits defined by the new Ecology policy.

In a related matter, the Pier 91 NOD of October 4, 1990 and the letter from Ecology to Chempro of October 18, 1990, discussed the need for the closure cost estimate to be based on off site treatment. Both the NOD and the letter failed to explicitly state something of which you should be aware. All closure cost estimates must reflect procedures which are found in the closure plan. In this case, Chempro must include transportation and off site treatment in the closure plan. As it is likely that on site treatment will be available at closure, this should remain in the plan. Transportation and off site treatment should exist as contingencies, but as this would be the most costly scenario, closure cost estimates must include them.

If you have any further questions in these matters please contact either Doug Brown at 459-6993 or myself at 438-7019.

Sincerely,

Cindy J. Gilder

Cindy J. Gilder
Section Head
Hazardous Waste Permits

cc: Barb Smith, NWRO
Dave Croxton, EPA

S. Korsic
entry - Dahm
- Small

CHRISTINE O. GREGOIRE
Director

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

January 5, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dennis Stefani
Director, Environmental Affairs
Chemical Processors, Inc.
2203 Airport Way South Suite 400
Seattle, Washington 98134

Dear Ms. Donahue:

The Department of Ecology has completed its review of ChemPro's response to the August 23, 1989 Notice of Deficiency (NOD). The submittal basically reflects the general closure guidelines for tank systems and container management units. However, some issues need further clarification.

The attached review comments are issued under the provisions of 173-303-840(1)(b) of the Washington Administrative Code. I am requesting that ChemPro resubmit the portions of the application deemed deficient by this review by February 15, 1990. Paul R. Stasch of my staff will be contacting Susan Donahue shortly to schedule a meeting to discuss the requested revisions.

Thank you in advance for your efforts and cooperation regarding this matter. I look forward to completing the permit process with you. If you have any questions, comments or both, please contact Paul by telephoning (206) 438-7410.

Sincerely,

Timothy L. Nord
Supervisor
Hazardous Waste Permits

Enclosures
cc: Paul Stasch
Howard Steeley
Carrie Sikorski, EPA
Tom Eaton w/o enclosures
CPT4a

CHEMICAL PROCESSORS, INC.
TACOMA DANGEROUS WASTE FACILITY
RCRA PART B PERMIT APPLICATION

NOTICE OF DEFICIENCY

SUBJECT REQUIREMENT: WAC 173-303 Section Reference

D PROCESS INFORMATION:

D-1 Container Management Practices: 320, 630

ChemPro has proposed stacking containers three high and fulfilling the general inspection requirements for the third tier through the use of a ladder. However, the response to the previous NOD did not adequately demonstrate how ChemPro would institutionalize its use. Please specify the number of ladders anticipated to be used and how the logistics of the various container pad/building sub-areas will effect its/their use. Please revise the training plan to reflect the new procedure.

As specified in the previous NOD, a minimum of three feet of clearance is necessary to maintain sufficient aisle space. If ChemPro is unwilling to modify figures D1-3 and D1-4 as requested then the permit will reflect this requirement as a permit condition.

D-2 Tank Operations and Management Practices: 640

More detailed specifications of the Solidification/ Stabilization Unit are needed for review. As it stands now there is not enough information to determine if the unit is a tank or a waste pile. A description of the liner system must be provided, as well as more information on the proposed monitoring well for leak detection. Additional justification is necessary to support the 1000 gallon design capacity for the free liquids and a discussion of the secondary containment capacity must be provided.

Please specify all measures that will be taken to ensure dragout by trucks being loaded/unloaded in the unit does not occur and those measures used to eliminate or reduce particulate and fugitive emissions from the unit during treatment.

Are solidified blocks going to be shipped offsite whole or will they be broken free of the "Tipplers"? Ecology is concerned about the need to break apart solidified blocks if it is not necessary. Provide justification as to the method selected.

The application states the open-topped tank will be totally enclosed by a building, yet neither figure D2-40 nor Appendix D-9 support this claim. Provide design drawings that support this claim.

There is no mention in the application's inspection plan that the tank system inspection routine will include measurement of the monitoring well underneath the Solidification/Stabilization Unit.

I CLOSURE:

Closure Plan: 610

In the previous NOD, Ecology requested ChemPro to revise the analysis for background and closure performance sampling to include total metals analysis. When requesting the additional total metal analysis for background and closure samples, Ecology did not mean to imply that EP Tox and TCLP analysis be dropped from the closure plan. If this is ChemPro's intent, please supply detailed rationale for deleting these analyses and any circumstances when these analyses would be necessary.

I was unable to find any mention of closure for the current solidification/stablization "stockpile" area used to load out trucks for offsite disposal. This must be included in the next submittal.

Soils around the current container pad must be sampled to ensure clean closure. Please revise the closure plan to address this issue.

Clearly define the terms "authorized facility" and "appropriate facility".

The closure performance standard to be met for site soils is environmental background. Please delete all references to a two tiered closure standard like the one found on page I8.

Specifically identify what the independent professional engineer will monitor during closure. Identify the major closure activities such as rinsing operations, soil sampling, ect. that the engineer will present for. Note these on the schedule of closure.

Will the certifying engineer review the operating record to identify biased sampling locations?

Better justification is necessary for the closure schedule

extension. For example, closure cost estimates for container pad decontamination are listed as taking thirty-nine man hours, described in the body of the text as requiring three weeks to complete and estimated to take four weeks to complete in the table on page I18. Similar inconsistencies exist for tank and solidification/stabilization closure. Please specify the number of weeks after initiation of closure each specific task will be completed.

Please specify the disposal/utilization options ChemPro is considering for all tanks during/following closure and how a particular option will be selected.

Describe how ChemPro will remove tank bottoms and container residues prior to triple rinsing. Please clarify how this will be accomplished during inventory elimination. Will the certifying engineer be onsite to monitor this phase of closure.

A detailed description of how ChemPro will manage generated rinsate must be included in the closure plan.

Closure performance sampling of soils must be through the concrete containment prior to removal. Please delete all references to post-removal sampling.

Ecology recommends that background samples be obtained from the offsite preload pile. Please revise the closure plan accordingly.

If ChemPro is unsure of what soil types underlie the units at the Tacoma facility then provisions must be made to identify the underlying soils prior to issuance of the permit.

Background samples must be analyzed for as broad a spectrum of chemical constituents as possible including waste constituents found in the wastes identified in the Part A and those which can reasonably be expected to be managed in the future but are not currently included in the permit application. The reason is the fate of the preload pile can not be predicted and therefore may not remain available at the time of closure for additional background sampling.

Please specify ChemPro's contingency should the number of biased sample locations be greater than or less than predicted. Would this change the overall number of closure performance samples and if so how?

Please specify what impact a "hit" on the analytical result of a discrete VOA of a random sample would have on the interpretation of the proposed compositing analysis.

Please supply a detailed rationale for assuming a 25% compaction rate of containerized waste. This must include a detailed description of the compaction process and how the compactor will be decontaminated.

The closure performance analysis needs to be better related to the wastes identified on the Part A. Certain chemical families are conspicuously absent from the closure analysis such as PCBs, pesticides and PNAs.

The closure period is estimated to take fifty-eight weeks. Is this consistent with the requested closure schedule extension?

Analytical holding time constraints were not adequately addressed for the retained portion of the random closure samples.

Clearly identify the area(s) where equipment and materials, including pumps and piping, will be decontaminated. Detail the steps necessary to decontaminate the dedicated area(s).

Please specify in detail the triple rinsing procedures for pumps and piping.

On the top of page I28 ChemPro states the amount of rinsate may vary according to the rinse method selected. Please specify the rinse methods selected for each tank or waste types.

In the second paragraph on page I28 there is a mention of "written proof of decontamination". Please specify who will provide this written proof and what it consists of.

In the forth paragraph on page I28 there is a mention of "no residual contamination". Please define this term.

Page I30 describes the first stage of decontamination. Please describe all others.

Table I.1-3 should include pumps and vacuum trucks.

On page I32 ChemPro has proposed to reject any sample locations randomly selected within ten feet of selectively sampled sump locations. Ecology feels this distance is too great and suggests reducing the distance to five feet.

How are "commonly associated" concrete constituents defined and how will they be evaluated and compared to identical constituents managed within whose containment systems.

Please detail ChemPro's proposal to resample containment structures if the initial round of sample analysis shows unacceptable levels of contamination.

Please modify the closure plan to include seven day notification to Ecology prior to any background or closure performance sampling events.

Ecology feels the mean plus two standard deviations is the most appropriate benchmark to evaluate when background environmental levels have been exceeded. However Ecology recognizes there will be circumstances when open discussions with ChemPro to examine minor exceedences will be necessary. This approach is reasonable considering the proposed Subpart S regulations.

J FINANCIAL REQUIREMENTS:

J-1 Closure Cost Estimates: 620

Please revise closure cost estimates to include total metal, EP Tox metal and TCLP analysis for closure performance analysis. (See prior comments)

Please supply supporting data for the closure cost estimate of four dollars per drum for disposal. Demonstrate that the cost of rinsate disposal is included in this four dollar per drum estimate.

Transportation cost estimates for incineration seem lower than the expected market rate. Please supply supporting data/rationale for the lower transportation figure.

Please supply the cost estimates for the labor necessary for tank cleaning, tank removal, and pump and piping decontamination.

Please revise the cost estimates for the additional soil sampling around the current container offloading area requested above.

The closure cost estimate for the services of the independent professional engineer are not consistent with the hours determined to be necessary to oversee closure activities presented on page I8 of the closure plan. Please correct this inconsistency.

As requested in the last NOD, the maximum amount of dangerous waste in treatment units must be included in the maximum waste inventory. The amount of generated waste must also be

included. Please revise the cost estimates to reflect these changes in the maximum waste inventory.

Cost estimates for rinsate management must be included.

On page I29, the closure plan states four gallons of rinsate will be generated per square foot. Please specify if this is a single or triple rinse estimate. Revise cost estimates if necessary.

Revise cost estimates for all changes in background and closure sample analysis.

Is the statement on page I45, that flammable liquids are the most expensive wastes to dispose of, erroneous.

Table I-1a references a cost estimate of $22/hour for laborers which is earlier estimated at $24/hour. Please resolve this discrepancy and revise the cost estimate if necessary.